

ORIGINAL

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268**

RECEIVED

JAN 28 12 45 PM '99

OFFICE OF THE SECRETARY

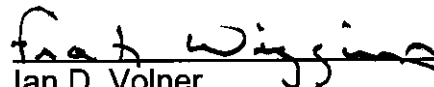
Mailing Online Services

Docket No. MC98-1

**PITNEY BOWES INTERROGATORIES
TO USPS WITNESS SECKAR
(PB/USPS-T2-6)**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, Pitney Bowes Inc. ("PB") hereby propounds the attached interrogatories and requests for the production of documents. The instructions for responding contained in the First Set of Interrogatories of Pitney Bowes Inc. to USPS Witness Plunkett are incorporated by reference.

Respectfully submitted,

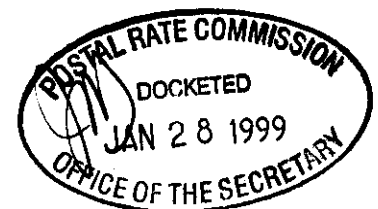


Ian D. Volner
N. Frank Wiggins
Venable, Baetjer, Howard & Civiletti, LLP
1201 New York Avenue, NW
Washington, DC 20005
(202) 962-4800

Aubrey M. Daniel III
Carolyn H. Williams
Williams & Connolly
725 12th Street, NW
Washington, DC 20005

Counsel to Pitney Bowes Inc.

DC1:87984



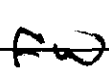
PB/USPS-T2-6

Please disclose how much of the Information Systems costs (both one-time and variable) reported at Worksheet 2 of your Updated Response of Postal Service Witness Seckar to question posed by Presiding Officer LeBlanc at the hearing on November 20, 1998 had, been expended or irrevocably committed at the date of your Updated Response.

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served this document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

DATE: January 28, 1998

Ian Dolner 
Ian D. Volner